



# Memorandum

U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

Date: APR - 6 2000

Reply to Attn. of: Gorsky, x69532

Subject: Request for Interpretation

*Thomas G. Allan*

From: Thomas G. Allan  
Senior Transportation Regulations Specialist  
Office of Hazardous Materials Standards

To: Stephen E. Barber  
Acting Director of Enforcement and Compliance  
Federal Motor Carrier Safety Administration

This responds to your request for an interpretation, dated March 27, 2000, of certain record keeping requirements applicable to cargo tanks used to transport liquefied compressed gases under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask about the information that will be required to document hose testing conducted by a Registered Inspector in accordance with § 180.407(h)(4) of the HMR.

You are correct that, as currently written, the language related to record keeping in § 180.407(h)(4) is unclear, particularly the reference to the date of the "original hose assembly test." The inclusion of the term "original" in this paragraph was inadvertent. To comply with the record keeping requirements in this paragraph, a Registered Inspector must note the hose identification number of the hose being tested, the date of the test, and the condition of the hose assembly and piping system tested. We will delete the inadvertent reference to an "original" hose assembly test in a future rulemaking.

Your understanding of the hose marking requirements is correct. Section 180.416(b) of the HMR requires operators to assure that each cargo tank delivery hose assembly is permanently marked with a unique identification number and maximum working pressure. This marking must be applied by July 1, 2000. In addition, after July 1, 1999, new and repaired hose assemblies must be marked with the month and year that they were pressure tested in accordance with §§ 178.337-9(b)(7) and 180.416(f). Hose assemblies manufactured or repaired prior to July 1, 1999, will not have this test marking.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.



U.S. Department  
of Transportation

Federal Motor Carrier  
Safety Administration

# Memorandum

Gorsky  
§ 180.407  
00-0089

Subject: Request for Interpretation

Date: MAR 27 2000

From: Acting Director of Enforcement  
& Compliance

Reply to  
Attn. of:

To: Mr. Ed Mazzullo  
Director, Office of Hazardous  
Materials Standards  
Research and Special Programs Administration

The Federal Motor Carrier Safety Administration (FMCSA) is moving forward to ensure compliance with rules promulgated under Docket HM-225 A (Revision to Regulations Governing Transportation and Unloading of Liquefied Compressed Gases). A question has been forwarded to us requesting a clarification of 180.407(h)(4). The issues and concerns are explained below.

The last sentence in 180.407(h)(4) reads as follows:

“ In addition to a written record of the inspection prepared in accordance with §180.417(b), the Registered Inspector conducting the hose test must note the hose identification number, the date of the original hose assembly test, and the condition of the hose assembly and piping system tested”.

It is our understanding the meaning of “original hose assembly test” is the test identified in 178.337-9(b)(7).

Prior to June 1, 1999 there was no requirement for a hose assembler to mark the hose with the month and year of its original hose assembly test. What information, if any, will be required of the Register Inspector to comply with 180.407(h)(4) when inspecting hoses assembled prior to June 1, 1999?

Stephen E. Barber